PART 70 SIGNIFICANT SOURCE MODIFICATION

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT - OFFICE OF AIR QUALITY
and
VIGO COUNTY AIR POLLUTION CONTROL

Bemis Company Inc.
1350 North Fruitridge Ave.
Terre Haute, Indiana 47804

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 167-16521-00033	
Issued by: Original Signed by John B. Chavez George M. Needham, DIrector Vigo County Air Pollution Control	Issuance Date: April 10, 2003

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SECTION A SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Vigo County Air Pollution Control (VCAPC). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary flexible packaging production facility that includes extrusion of polyethylene film, converting, and printing operations.

Responsible Official:	Plant Manager
Source Address:	1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address:	P.O. Box 905, Terre Haute, Indiana 47808
General Source Phone Number:	(812)466-2213
SIC Code:	2673, 3081, and 3079
County Location:	Vigo County
Source Location Status:	Maintenance attainment for Sulfur Dioxide Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Major Source, under PSD Rules;

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

(1) Windmoeller & Hoelscher Astraflex eight color flexographic printing press, identified as Press 33, using catalytic incineration as control, and exhausting to ganged incinerators..

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)][326 IAC 2-7-5(15)]

This modification to a stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1(21).

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.3 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.4 Significant Source Modification [326 IAC 2-7-10.5(h)]

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

(a) The attached affidavit of construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.

(b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.

(c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

(e) In the event that the Part 70 application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:

(1) If the Part 70 draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Part 70 draft.

(2) If the Part 70 permit has gone through final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go through a concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Part 70 permit at the time of issuance.

(3) If the Part 70 permit has gone through public notice, but has not gone through final EPA review and would be issued after the Significant Source Modification is issued, then the Modification would be added to the proposed Part 70 permit, and the Title V permit will issued after EPA review.

B.5 Local Agency Requirement

This approval is also the initial local operation permit. No other approvals are required.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) when operation begins, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ and VCAPC, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and VCAPC. IDEM, OAQ and VCAPC, may require the Permittee to revise its PMPs whenever lack of

proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Vigo County Air Pollution Control makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Vigo County Air Pollution Control within a reasonable time.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment

listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

Testing Requirements [326 IAC 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

(a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ and VCAPC.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ and VCAPC of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and VCAPC not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAM and VCAPC, if the source submits to IDEM, OAQ and VCAPC, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

If required by Section D, all monitoring and record keeping requirements shall be implemented when operation begins. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.11 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of any other operating parameter, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Permittee may request the IDEM, OAQ and VCAPC approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Compliance Response Plan - Preparation, Implementation, Records, and Reports[326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and VCAPC upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the

Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ and VCAPC shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and VCAPC, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM
Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

VCAPC
Telephone Number: 812-462-3433
Facsimile Number: 812-462-3447

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ and VCAPC, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ and VCAPC, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ and VCAPC, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ and VCAPC that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ and VCAPC may extend the retesting deadline.

(c) IDEM, OAQ and VCAPC reserve the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.15 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Vigo County Air Pollution Control makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Vigo County Air Pollution Control within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.16 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) The reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

And

Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and VCAPC, on or before the date it is due.

(c) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(1) Windmoeller & Hoelscher Astraflex eight color flexographic printing press, identified as Press 33, using catalytic incineration as control, and exhausting to ganged incinerators.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOCs) Use [326 IAC 2-2][40 CFR 52.21][326 IAC 8-5-5]

The VOC content delivered to the printing press (press 33) shall not exceed 193.25 tons per 12 consecutive month period with compliance determined at the end of each month. This condition, in combination with the capture and destruction efficiency requirements, result in the addition of this press not being subject to the provisions of 326 IAC 2-2 (Prevention of Significant Deterioration).

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-5-5][326 IAC 2-2][40 CFR 52.21]

The capture system of the printing press (press 33) shall be constructed and operated in such a manner to attain and maintain a 100% VOC capture efficiency. This condition, along with the incineration requirements below, will also satisfy the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) which requires a minimum 60% overall control efficiency for flexographic printing.

The ganged incinerators shall maintain a minimum destruction efficiency of 95%. This condition will also satisfy the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) which requires either a minimum destruction efficiency of 90% or solvent content limitations.

This condition, in combination with the VOC use limitation above, result in the addition of this press not being subject to the provisions of 326 IAC 2-2 (Prevention of Significant Deterioration).

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

Within sixty (60) days after achieving maximum production rates, but no later than 180 days after initial start-up, the Permittee shall perform VOC capture efficiency tests on the printing press, as well as a destruction efficiency test on the incinerator, utilizing standard methods from 40 CFR 60 Appendix A, or other methods as approved by the IDEM, OAQ and VCAPC. These tests shall be performed at least once every five years from the date of this valid compliance demonstration. In addition to these requirements, IDEM, OAQ and VCAPC may require compliance testing when necessary to determine if the facilities are in compliance. This testing shall also meet the requirements, including notifications, of Section C - Testing Requirements of this permit and 326 IAC 3-6.

D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-4][326 IAC 8-1-2]

Compliance with the VOC usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ and VCAPC, reserve the authority to determine compliance using Method

24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 VOC Control

The catalytic incineration system shall be in use any time the printing press is in operation. When operating the catalytic incinerator shall maintain a minimum catalyst bed inlet temperature of 500 EF in order to ensure the minimum 95% VOC destruction efficiency is attained. A record of the required incinerator temperature shall be logged continuously and maintained. An automated system to shut down the associated printing presses whenever the minimum temperature can not be maintained ensures compliance with this condition.

D.1.7 Incinerator Ganging

Incinerators Unit 9, Unit 10, Unit 11 and Unit 12, are each designed to handle 12, 750 acfm of solvent laden air. Incinerators Unit 5, Unit 6, Unit 7 and Unit 8 are each designed to handle 8,500 acfm. All incinerators are automatic and PC controlled. These incinerators are considered to be combined with the following restrictions:

(a) Before any of the affected presses (Presses #19 through #32 plus Press #34 and Press #35, and Press #33) can operate, one incinerator shall be warmed up, and operational;

(b) Presses #19 through #26 are each rated at 4250 acfm. Presses #27 through #32 plus Press #34 and Press #35 and Press #33 are each rated at 6375 acfm. The combined airflow (acfm, using the rated capacities) of all the presses in operation shall not exceed the combined rated airflow (acfm) of the incinerators that are in operation at any time.

(c) In the event that the currently operating incinerators are at their maximum input airflow, one (1) additional incinerator shall be warmed up and on standby (if available).

(d) In the event that an incinerator fails, for any reason, the presses that incinerator was handling shall immediately be shut down. They can be restarted as soon as additional incineration capacity is brought online or by shutting other presses down.

(e) A log of all such occurrences shall be kept and made available to Vigo County Air Pollution Control (VCAPC) and the Office of Air Quality (OAQ) upon request. The log shall contain, as a minimum, the date and time of the occurrence, a description of the occurrence, and a description of the corrective action(s).

D.1.8 Monitoring

The Permittee shall conduct quarterly inspections of all components relating to the capture system. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.1**,** the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits established in Condition D.1.1.

(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall

differentiate between those added to coatings and those used as cleanup solvents;

(2) The cleanup solvent usage for each month;

(3) The total VOC usage for each month; and

(4) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.1.7 and Condition D.1.8, records of each press and each incinerator operating times shall be kept. These records shall be in a format sufficient to demonstrate compliance with the conditions, and shall also include a specific listing of times that printing operations were interrupted (including the reasons) due to incinerator related problems. Finally, a certification that each incinerator was operated at no less than the minimum permitted catalyst inlet bed temperature at all times it was in operation shall be included, unless this was not the case. If the incinerator was ever below the minimum temperatures then a detailed explanation shall be included.

(c) To document compliance with Condition D.1.8, the Permittee shall maintain records of each inspection or sample. These records shall include, as a minimum, dates, initials of the person performing the inspection or taking the sample, results, and corrective actions (if required).

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. Included with this report shall be a log of all times the minimum inlet catalyst bed temperature specified in Condition D.1.7 fell below the required minimum reading.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
VIGO COUNTY AIR POLLUTION CONTROL

PART 70 SOURCE MODIFICATION CERTIFICATION

Source Name: Bemis Company Inc.
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
Source Modification No.: 167-16521-00033

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
VIGO COUNTY AIR POLLUTION CONTROL

Part 70 Source Modification Quarterly Report

Source Name: Bemis Company Inc.
Source Address: 1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Mailing Address: PO Box 905, Terre Haute, Indiana 47808
Source Modification No.: 167-16521-00033
Facility: Press #33
Parameter: VOC Input
Limit: 193.25 tons of VOC per 12 consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Mail to: Vigo County Air Pollution Control
103 South 3rd Street
Terre Haute, Indiana 47807

Bemis Company Inc.
PO Box 905
Terre Haute, Indiana 47808

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____,I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____ .
(Company Name)

4. I hereby certify that Bemis Company Inc., 1350 North Furitridge Ave., Terre Haute, Indiana 47804, has constructed the flexographic printing press in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on August 30, 2002 and as permitted pursuant to **Source Modification No. 167–16521-00033** issued on _____

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

_____
Signature

_____
Date

STATE OF INDIANA)
)SS
COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 20 _____ .

My Commission expires: _____

_____
Signature

_____
Name (typed or printed)

CC: IDEM-OAQ, Compliance Data Section

Indiana Department of Environmental Management
Office of Air Quality
and
Vigo County Air Pollution Control

Addendum to the
Technical Support Document for Significant Source Modification

Source Name:	Bemis Company Inc.
Source Location:	1350 North Fruitridge Ave., Terre Haute, Indiana
County:	Vigo County
SIC Code:	2673, 3081, and 3079
Operation Permit No.:	T167-6182-00033
Operation Permit Issuance Date:	Not yet issued
Significant Source Modification No.:	167-16521-00033
Permit Reviewer:	Rob Harmon

On February 18, 2003, Vigo County Air Pollution Control (VCAPC) had a notice published in the Terre Haute Tribune-Star, Terre Haute, Indiana, stating that Bemis Company Inc. had applied for a Source Modification to construct and operate a flexographic printing press (Press #33). The notice also stated that VCAPC proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed. Where applicable in this document the use of ~~strikeout~~ indicates removed language and **bold** indicates added language.

On March 10, 2003, Bemis Company Inc. submitted comments on the proposed Significant Source Modification. The summary of the comments is as follows:

Comment 1:
In A.1 of the modification: change Responsible Official from Robert E. Heskett to Plant Manager.

Response to Comment 1:
Change made within Condition A.1 as follows:

Responsible Official: ~~Robert E. Heskett~~ **Plant Manager**

Comment 2:
In A.2 of the modification: replace exhaust language with “and exhausting to ganged incinerators.” Also, delete (2)

Response to Comment 2:
Change made as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)][326 IAC 2-7-5(15)]
This stationary source is approved to construct and operate the following emission units and pollution control devices:

(1) Windmoeller & Hoelscher Astraflex eight color flexographic printing press, identified as Press 33, using catalytic incineration as control, and **exhausting to ganged incinerators.** ~~primarily exhausting to stack I-13.~~

~~(2) Dec-E-Tec model CI-Eagle 6500-HT/65HE/1 Catalytic Incinerator, identified as Unit 13 (or I-13), with a maximum supplemental fuel burner capacity of 2.5 million BTU per hour (utilizing natural gas), a minimum inlet temperature to the oxidizing zone of 500 EF, and a maximum air~~

~~flow rate of 6,500 acfm. This unit exhausts to stack 13.~~

Comment 3:
In Section D.1 description: replace exhaust language with "and exhausting to ganged incinerators." Also, delete (2)

Response to Comment 3:
Change made as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(1) Windmoeller & Hoelscher Astraflex eight color flexographic printing press, identified as Press 33, using catalytic incineration as control, and **exhausting to ganged incinerators.** ~~primarily exhausting to stack I-13.~~

~~(2) Dec-E-Tec model CI-Eagle 6500-HT/65HE/1 Catalytic Incinerator, identified as Unit 13 (or I-13), with a maximum supplemental fuel burner capacity of 2.5 million BTU per hour (utilizing natural gas), a minimum inlet temperature to the oxidizing zone of 500 EF, and a maximum air flow rate of 6,500 acfm. This unit exhausts to stack 13.~~

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Comment 4:
In Condition D.1: remove "along with the incinerator requirements below" from the first paragraph. Also remove the second paragraph (Unit 13 specifics).

Response to Comment 4:
While the Unit 13 specifics must be removed (since that incinerator will not be installed), the references to incineration in general are required to demonstrate compliance with 326 IAC 8-5-5 as well as to show why the requirements of 326 IAC 2-2 do not apply. The condition will now read as follows:

D.1.2 Volatile Organic Compounds (VOCs) [326 IAC 8-5-5][326 IAC 2-2][40 CFR 52.21]

The capture system of the printing press (press 33) shall be constructed and operated in such a manner to attain and maintain a 100% VOC capture efficiency. This condition, along with the incineration requirements below, will also satisfy the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) which requires a minimum 60% overall control efficiency for flexographic printing.

The ~~incinerator (Unit 13)~~ **ganged incinerators** shall maintain a minimum destruction efficiency of 95%. This condition will also satisfy the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) which requires either a minimum destruction efficiency of 90% or solvent content limitations.

This condition, in combination with the VOC use limitation above, result in the addition of this press not being subject to the provisions of 326 IAC 2-2 (Prevention of Significant Deterioration).

Comment 5:
In Condition D.1.7 remove the references to Unit 13 (which will not be installed), and add language "all incinerators are automatic and PC controlled."

Response to Comment 5:
The changes were made as follows:

D.1.7 Incinerator Ganging

Incinerators Unit 9, Unit 10, Unit 11 and Unit 12, are each designed to handle 12, 750 acfm of solvent laden air. Incinerators Unit 5, Unit 6, Unit 7 and Unit 8 are each designed to handle 8,500 acfm. ~~Incinerator Unit 13 is designed to handle 6,500 acfm.~~ **All incinerators are automatic and PC controlled.** These incinerators are considered to be combined with the following restrictions:

a. Before any of the affected presses (Presses #19 through #32 plus Press #34 and Press #35, and Press #33) can operate, one incinerator shall be warmed up, and operational;

b. Presses #19 through #26 are each rated at 4250 acfm. Presses #27 through #32 plus Press #34 and Press #35 and Press #33 are each rated at 6375 acfm. The combined airflow (acfm, using the rated capacities) of all the presses in operation shall not exceed the combined rated airflow (acfm) of the incinerators that are in operation at any time.

c. In the event that the currently operating incinerators are at their maximum input airflow, one (1) additional incinerator shall be warmed up and on standby (if available).

d. In the event that an incinerator fails, for any reason, the presses that incinerator was handling shall immediately be shut down. They can be restarted as soon as additional incineration capacity is brought online or by shutting other presses down.

e. A log of all such occurrences shall be kept and made available to Vigo County Air Pollution Control (VCAPC) and the Office of Air Quality (OAQ) upon request. The log shall contain, as a minimum, the date and time of the occurrence, a description of the occurrence, and a description of the corrective action(s).

Comment 6:
The same changes as in Comment 2 and Comment 3 above, except to the emission unit description in the TSD and the History section of the TSD.

Response to Comment 6:
This document is added to the TSD as it was presented for public notice. The change is noted here, however the TSD itself is not being revised.

Comment 7:
Why are (b) and (c) included in the TSD Enforcement Issue section?

Response to Comment 7:
Existing enforcement issues can affect the preparation of new modifications. Therefore the TSD need to list all enforcement issues that have been identified and are still open, even if they don't directly relate to the specific requested approval.

Comment 8:
Delete any other sections that would apply to Unit 13 (since it is not being installed).

Response to Comment 8:
We are aware of the change in plans. References to Unit 13 have been removed as requested above as well. Additionally, the following change is made:

D.1.8 Monitoring

The Permittee shall conduct quarterly inspections of all components relating to the capture system. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

~~The Permittee shall also conduct annual sampling and testing of the catalyst utilized in the catalytic incinerator in order to determine if it has reached a point where the effectiveness is diminished to a~~

~~point where compliance with the minimum destruction efficiency is at risk. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

This change only removes the requirement that would have been placed on Unit 13. It in no way affects similar requirements on the existing incinerators that will be used instead for VOC control of this new printing press.

Indiana Department of Environmental Management
Office of Air Quality
and
Vigo County Air Pollution Control

Technical Support Document (TSD) for a Part 70 Significant Source Modification.

Source Background and Description

Source Name:	Bemis Company Inc.
Source Location:	1350 North Fruitridge Ave., Terre Haute, Indiana
County:	Vigo County
SIC Code:	2673, 3081, and 3079
Operation Permit No.:	T167-6182-00033
Operation Permit Issuance Date:	Not yet issued
Significant Source Modification No.:	167-16521-00033
Permit Reviewer:	Rob Harmon

Vigo County Air Pollution Control (VCAPC) and the Office of Air Quality (OAQ) have reviewed a modification application from Bemis Company Inc. relating to the construction of the following emission units and pollution control devices:

(1) Windmoeller & Hoelscher Astraflex eight color flexographic printing press, identified as Press 33, using catalytic incineration as control, and primarily exhausting to stack I-13.

(2) Dec-E-Tec model CI-Eagle 6500-HT/65HE/1 Catalytic Incinerator, identified as Unit 13 (or I-13), with a maximum supplemental fuel burner capacity of 2.5 million BTU per hour (utilizing natural gas), a minimum inlet temperature to the oxidizing zone of 500 EF, and a maximum air flow rate of 6,500 acfm. This unit exhausts to stack 13.

History

On August 30, 2002, Bemis Company, Inc. submitted an application to the OAQ and VCAPC requesting to add one additional printing press and a related catalytic incinerator to their existing plant. Bemis Company, Inc. applied for a Part 70 permit on June 24, 1996. This permit has not yet been issued, but the information in this application will be incorporated into that application.

Enforcement Issue

(a) IDEM and VCAPC are aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in the Part 70 Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment.* Some of this equipment would have been subject to PSD review.

IDEM and VCAPC are reviewing this matter and will take appropriate action. The proposed Part 70 permit is intended to satisfy the requirements of the construction permit rules.

(b) IDEM and VCAPC are aware that several of the in-line flexographic printing presses (E5, E15, E17, E18, E19, E20, E22, E23, and E31) are not in compliance with 326 IAC 8-5-5 which requires either use of low VOC coatings, or some VOC control equipment.

IDEM and VCAPC are reviewing this matter and have taken appropriate action. The Federally Enforceable Limitations in the proposed Part 70 permit will allow the above specified printing presses to no longer be subject to those requirements.

(c) IDEM and VCAPC are aware that the Printing Presses #17 and #18 have not been in compliance with the monthly and annual VOC use limits from previous permits.

IDEM and VCAPC are reviewing this matter and will take appropriate action.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
I-13	Catalytic Incineration	50	2.83	6,500*	385*

* indicates that those values are variable based on the solvent load, temperature of catalytic reduction, and the efficiency of the heat exchanger.

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on August 30, 2002. Additional information was received on September 27, 2002.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (4 pages).

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0.02
PM-10	0.08
SO_2	0.01
VOC	193.31
CO	0.92
NO_x	1.10

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Source Modification. This modification is being performed pursuant to 326 IAC 326 IAC 2-7-10.5(g) because the potential VOC emissions are greater than 25 tons per year (triggers 326 IAC 2-7-10.5(f)(4)). It can not qualify for the Minor Source Modification under 326 IAC 2-7-10.5(e) even though the emissions are limited to less than 25 tons per year because the method of limiting emissions is not specified in 327 IAC 2-7-10.5(d)(5)(A) through (E). This approval will be for both construction and operation of the specified facilities.

County Attainment Status

The source is located in Vigo County.

Pollutant	Status
PM-10	attainment
SO_2	maintenance attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Vigo County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Vigo County has been classified as attainment or unclassifiable for all criteria Pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO_2	less than 100
VOC	greater than 250
CO	less than 100
NOx	less than 100

(a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions are based upon the Part 70 Permit application.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X	HAPs
Press #33				9.66			
Incineration Fuel Use (supplement)	0.02	0/08	0.01	0.06	0.92	1.10	NA
Total	0.02	0.08	0.01	9.72	0.92	1.10	NA
PSD Significant Threshold	25	15	40	40	100	40	variable
Significant ?	N	N	N	N	N	N	N

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Bemis Company is required to use the catalytic oxidizer at all times when the press is in operation. This control equipment shall attain and maintain at least 100% capture efficiency and 95% destruction efficiency. The maximum solvent use provided in the application, and used as a basis for these calculations, will also be included as a limit. This limitation would be 193.25 tons of VOC input to the press (press 33) during any 12 consecutive month period with compliance determined at the end of each month.

Normally the limitation of VOC input would not be required, however, this is not exactly a normal case. The potential VOC use was not calculated at maximum press linespeed and maximum VOC coverage because they can not be operated in that manner and still produce their product. The process was looked at from a bottleneck perspective, where the drying capacity of the printing press reduces how much VOC can be utilized. In this case there were 2 scenarios developed, and the worst case of those two was considered to be the potential to emit. The scenarios are: Maximum linespeed and normal VOC coverage; and normal linespeed and maximum VOC coverage. This procedure has been applied for applications from Bemis for the last 10 years or more.

Federal Rule Applicability

(a) These flexographic printing presses and in-line flexographic printing presses are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430), Subpart QQ, due to the type of printing. Bemis Company, Inc. utilizes flexographic printing and this NSPS is specifically for publication rotogravure printing.

(b) These flexographic printing presses and in-line flexographic printing presses are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63 Subpart KK due to the fact that Bemis Company, Inc. is not a major source of Hazardous Air Pollutants (HAPs).

(c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63 Subpart JJJJ because they are not a major source of Hazardous Air Pollutants (HAPs).

(d) This source is not subject to the requirements of the 112j of the Clean Air Act Amendments of 1990 because they are not a major source of Hazardous Air Pollutants (HAPs).

(e) 40 CFR 64 Compliance Assurance Monitoring

(a) This significant source modification does operate a pollutant-specific emissions unit as defined in 40 CFR 64.1 for VOC.

(1) with the potential to emit before controls equal to or greater than the major source threshold for VOC.

(2) that is subject to an emission limitation or standard for VOC; and

(3) uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard.

Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are applicable to this modification.

(b) The pollutant-specific emission unit is not a "large unit" as described in 40 CFR 64.5. Therefore, the owner or operator shall submit a CAM plan pursuant to 40 CFR 64 as part of the Part 70 renewal application.

State Rule Applicability - Individual Facilities

326 IAC 8-5-5 (Graphic Arts Operations)

Pursuant to 326 IAC 8-5-5(e) (Graphic Arts Operations), a capture system must be used in conjunction with the emission control system. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency of not less than 60% for flexographic printing operations. Additionally, Bemis is not required to meet the solvent VOC content limitations in 326 IAC 8-5-5(c) because the design destruction efficiency is above the 90% minimum specified in 326 IAC 8-5-5(c)(3)(C).

Sufficient catalytic incineration capacity shall be in operation at all times the printing presses are in operation, in order to comply with this limit.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

1. The printing presses (and the associated catalytic incinerator) have applicable compliance monitoring conditions as specified below:

(a) The inlet temperature to the catalyst bed shall be continuously monitored. If the temperature reading begins to drop below the minimum 500 EF, an automated control system shall adjust the operation accordingly. If the temperature can not be maintained,

the printing presses relying on this incinerator for control shall be shut down until the inlet temperature can be maintained or the VOC laden emissions stream can be sent to another catalytic incineration unit.

(b) Annually the catalyst shall be sampled and tested to ensure it is still active. If testing indicates the catalyst can no longer maintain the minimum 95% destruction efficiency at the current minimum temperature then is shall be replaced.

(c) Quarterly the components of the capture system shall be inspected for proper operation.

These monitoring conditions are necessary because the catalytic incineration system for the printing presses must operate properly to ensure compliance with 326 IAC 8-5-5 (Graphic Arts Operations) and in order to avoid the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration).

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Source Modification No. 167-16521-00033.

Appendix A: Emission Calculations

Bemis Company, Inc.
1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Sig Source Mod: 167-16521-00033
Reviewed By: Rob Harmon
Application Received: August 30, 2002

Bemis Company, Inc. has previously petitioned that their potential would be more accurately be assessed by taking the maximum linespeed and a normal coating rate. This calculation can be checked by taking the maximum coating rate and the normal linespeed of the printing press. Since this method was previously approved and used in several construction permits, I am using it in this case as well.

VOC From Printing Press Operations
Maximum linespeed with the average coating rate case:

Throughput

Press ID	Max line speed (feet per min)	Max print width (inches)	Million square inches per year (MMin^2/Yr)
W&H Astraflex #33	1100	61	423213.12

Ink VOCs

Ink Name	Max Coverage (lbs/MMin^2)	Weight % Volatiles	Flash Off (percent)	Throughput (MMin^2/Yr)	Emissions (Ton/Yr)
Fast Solvent	0.14	100.00%	100.00%	423213.12	29.62
Slow Solvent	0.16	100.00%	100.00%	423213.12	33.86
Ink (colors)	0.43	57.00%	100.00%	423213.12	51.86
Ink (High Solids White)	0.7	35.00%	100.00%	423213.12	51.84
N-Propyl Acetate	0.06	100.00%	100.00%	423213.12	12.70
Glycol Ether (propylene)	0	100.00%	100.00%	423213.12	0.00
				Total VOC Emissions (Ton per Year)	179.89

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))

Appendix A: Emission Calculations

Bemis Company, Inc.
1350 North Fruitridge Ave., Terre Haute, Indiana 47804
Sig Source Mod: 167-16521-00033
Reviewed By: Rob Harmon
Application Received: August 30, 2002

VOC From Printing Press Operations
Maximum linespeed with the average coating rate case:

Throughput

Press ID	Max line speed (feet per min)	Max print width (inches)	Million square inches per year (MMin^2/Yr)
W&H Olympia 726 #34	760	55	263640.96

Ink VOCs

Ink Name	Max Coverage (lbs/MMin^2)	Weight % Volatiles	Flash Off (percent)	Throughput (MMin^2/Yr)	Emissions (Ton/Yr)
Fast Solvent	0.22	100.00%	100.00%	263640.96	29.00
Slow Solvent	0.3	100.00%	100.00%	263640.96	39.55
Ink (colors)	0.8	57.00%	100.00%	263640.96	60.11
Ink (High Solids White)	1.3	35.00%	100.00%	263640.96	59.98
N-Propyl Acetate	0.03	100.00%	100.00%	263640.96	3.95
Glycol Ether (propylene)	0.005	100.00%	100.00%	263640.96	0.66
				Total VOC Emissions (Ton per Year)	193.25

METHODOLOGY

Throughput = Maxium line speed feet per minute * Convert feet to inches * Maximum print width inches * 60 minutes per hour * 8760 hours per year = MMin^2 per Year

VOC = Maximum Coverage pounds per MMin^2 * Weight percentage volatiles (water minus organics) * Flash off * Throughput * Tons per 2000 pounds = Tons per Year

NOTE: HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.

(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))

The worst case is the maximum coverage with the average linespeed and print width. Using this worse case both the before and after control potential emissions can be quantified.

193.25	Potential Emissions of VOC (tons per year) before control
100.00%	Capture Efficiency
95.00%	Destruction Efficiency
95.00%	Effective Control Efficiency
9.66	Potential Emissions of VOC (tons per year) after control

METHODOLOGY

Effective Control Efficiency = Capture Efficiency * Destruction Efficiency (both in fraction form)

Pot After Control = Pot Before Control * (1 - Effective Control Efficiency (in fraction form))

Appendix A: Emission Calculations

Bemis Company, Inc.
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Sig Source Mod: 167-16521-00033
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Potential Emissions from Incinerator Fuel Use

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
2.5	21.9

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see belo	5.5	84.0
Potential Emission in tons/yr	0.02	0.08	0.01	1.10	0.06	0.92

*PM emission factor is filterable PM only. PM10 emission factor is condensable and filterable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emission Calculations

Bemis Company, Inc.
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Sig Source Mod: 167-16521-00033
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Total Potential Emissions Before Control

Facility	PM	PM10	SO2	NOx	VOC	CO
Printing Presses					193.25	
Incinerator Fuel Consumption	0.02	0.08	0.01	1.10	0.06	0.92
Total	0.02	0.08	0.01	1.10	193.31	0.92

Total Potential Emissions After Control

Facility	PM	PM10	SO2	NOx	VOC	CO
Printing Presses					9.66	
Incinerator Fuel Consumption	0.02	0.08	0.01	1.10	0.06	0.92
Total	0.02	0.08	0.01	1.10	9.72	0.92
PSD Significant Threshold	25	15	40	40	40	100
Significant ?	N	N	N	N	N	N